

**BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL**

In the Matter of:)	CASE NO. 15-001
Application No. 2013-01)	
)	INTERVENOR CITY
TERSORO SAVAGE, LLC)	OF WASHOUGAL'S PRELIMINARY
)	PREHEARING ORDER DISCLOSURES
VANCOUVER ENERGY DISTRIBUTION)	
TERMINAL)	
)	
)	

COMES NOW, The City of Washougal, Washington, intervenor herein with preliminary disclosures in response to the Prehearing Order.

The City of Washougal identifies its preliminary issues below while reserving the right to revise or add to these issues as additional factual information is provided through discovery, SEPA, and adjudicative proceeding raising concerns over the Proposal. The City further incorporates issues presented by all parties to the adjudicated proceeding raising concerns over the Proposal.

FURTHER the City reserves the right to present argument and evidence on all issues EFSEC considers.

ISSUES

Aspect Engineering

- a. Potential for adverse effects on groundwater quality in the City of Washougal if a crude oil spills during transport to the proposed Marine Transfer Facility.

The City of Washougal's primary water supply is the ground water source obtained from the wellfield (Lower Wellfield) constructed in a shallow, unconfined alluvial aquifer, with porous alluvium present from the ground surface to the intake screens of the wells. The City's Lower Wellfield is highly susceptible to groundwater contamination from a crude oil spill during rail transport to the proposed marine transfer facility.

The DEIS acknowledges that rail corridor crosses the five (5) year wellfield protection area for several cities, as specifically mentioned communities such as Bingen and North Bonneville where this occurs. However, the overlapping five (5) year wellhead protection area for the City of Washougal's primary wellfield is not mentioned.

Patriot Technical Consultants, Inc.

1. Public Safety Risk Analysis and Review, Potential Adverse Consequences to the City of Washougal including, but not limited to the following:
 - a. Environmental, Impacts and Mitigation Measures
 - b. Crude Oil Safety Considerations, Potential Release Scenarios and Impact Analysis
 - c. Risk Analysis of Train Derailments Resulting in Fires and Explosions
 - d. Analysis of Risks of Train Accidents or Rail Transportation in the City of Washougal
 - e. Fire Department Capabilities Gap Analysis and Risk Reduction in the City of Washougal
 - f. Required Mitigation Measures for Spills, Fires and Explosion of Crude Oil in the City of Washougal.
 - g. Local Traffic Delays Due to Increased Number of Unit Trains and the Effect On Emergency Providers With At Grade Crossings
 - h. Failure of the DEIS to Appropriately Address the Foregoing Concerns and Issues

EXHIBITS

Aspect Engineering

- Exhibit A Plan view map illustrating proximity of the City of Washougal's primary wellfield to BNSF rail line
- Exhibit B Cross section of hydrogeologic conditions in the vicinity of the City's primary wellfield, with reference to location o BNSF rail line
- Exhibit C City of Washougal's Wellhead Protection Capture Zones and Critical Aquifer Recharge Area
- Exhibit D Selected portions of the City of Washougal's June 2012 Water System Plan Update

Patriot Technical Consultants, Inc.

- Exhibit E Report dated December 21, 2015 entitled Public Safety Technical Review for the City of Washougal, Washington of the Draft Environmental Impact Statement for the Tersoro Savage Vancouver Energy Project with Exhibits, Appendixes and attachments.

WITNESSES

Aspect Engineering

- a. Carl Einberger, LHG, CWRE, Associate Hydrogeologist
- b. Tim Flynn, LHG, CGWP, Principal Hydrogeologist

Patriot Technical Consultants, Inc.

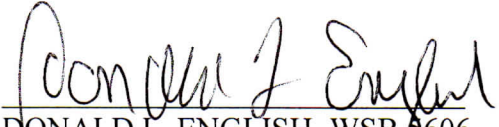
- c. Dan Monaghan
- d. David Lincoln
- e. Paul Day

City of Washougal

- f. David Scott, City Administrator for the City of Washougal
- g. Trevor Evers, Public Works Director for the City of Washougal
- h. Ron Schumacher, Fire Division Chief and Fire Marshall for the Camas/Washougal Fire Department
- I. Greg Payne, Training and Safety Captain for Camas/Washougal Fire Department
- j. Nike Swinhart, Fire Chief for Camas/Washougal Fire Department

DATED this 8th of JANUARY, 2016.

Submitted by:


DONALD L. ENGLISH, WSB 8606
City Attorney for the City of Washougal

C E R T I F I C A T E O F F I L I N G

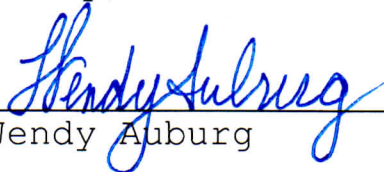
I certify that on January 8, 2016, I filed this INTERVENOR CITY OF WASHOUGAL'S PRELIMINARY PREHEARING ORDER DISCLOSURES by electronic mail to the following electronic filing address:

EFSEC@utc.wa.gov

and sent the original document by first class U.S. mail, postage prepaid, to the following mailing address:

Energy Facility Site Evaluation Council
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-3172

DATED this 8th day of January, 2016.


Wendy Auburg

C E R T I F I C A T E O F S E R V I C E

I certify that on January 8, 2016, I served the attached INTERVENOR CITY OF WASHOUGAL'S PRELIMINARY PREHEARING ORDER DISCLOSURES to the parties of record in this matter by forwarding a copy thereof to all parties listed below via electronic mail.

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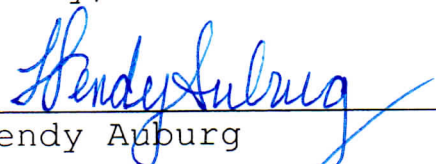
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DATED this 8th day of January, 2016.


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